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Facsimile: (801) 665-0128 Attorneys for Defendant gskordas@schhlaw.com kbeckett@schhlaw.com

IN THE UNITED STATES DISTRICT COURT DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON MICHAEL SHAMO, et. al.,

Defendant.

NOTICE OF EXPERT ERIC WHEELER

Case No. 2:16-CR-00631 DAK

Judge Dale A. Kimball

The Defendant, Aaron Michael Shamo, through his counsel Gregory G. Skordas, hereby gives notice of his intent to offer expert testimony through Eric Wheeler.

The nature of that testimony is as follows: Mr. Wheeler has reviewed all data and information provided by the Government concerning electronic data, electronically stored information, computer records, and the defendant's alleged use of the "dark web" for drugs sales related to several of the counts in the Second Superseding Indictment. Specifically, Mr. Wheeler has reviewed the cell phones, computers, and electronic devices of co-defendants and co-conspirators.

Mr. Wheeler has also been retained to provide testimony as to the nature of online records, the content of those records, and the foundation of those records. Mr. Wheeler may

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provide testimony as to any alleged activity of the Defendant which occurred on the "Dark

Web."

Mr. Wheeler has not, as of the date of those notice, provided a final written report. As

soon as one is available it will be made available to the Government. A copy of Mr. Wheeler's

CV is attached. Mr. Wheeler is available through Defense Counsel to cooperatively consult with

the Government.

DATED this 26th day of April 2019.

SKORDAS & CASTON, LLC

/s/ Gregory G. Skordas

Gregory G. Skordas Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of April 2019, I filed a true and correct copy of the foregoing **NOTICE OF EXPERT ERIC WHEELER**, with the Clerk of the Court using CM/ECF system, which sent notification of such filing to the following:

S. Michael Gadd mgadd@agutah.gov

Vernon G. Stejskal Vernon.stejskal@usdoj.gov

Adam S. Elggren Adam.elggren@usdoj.gov

> /s/ Sabrina Nielsen-Legal Secretary SKORDAS & CASTON, LLC

Curriculum Vitae of Eric Wheeler 5664 S. Green Street Suite 303 Salt Lake City, Utah (801)303-7858

My Technological background includes demonstrative graphic creation, legal document management software support, trial presentations and forensic computer analysis. I am fluent in multiple CPU operating systems and have provided IT support for both Apple OS and Windows systems. I taught various advanced graphic classes at USU including; "Photoshop for Photographers", "Typography". While working in the advertising industry I held seniority project management roles while working on global clientele including but not limited to; BMW, Chevrolet, FOX, Kellogg's, Crate and Barrel, Intel and Microsoft. After having transitioned into the legal services I have presented evidence in over 50 trials and have national client base. I am certified in computer forensics through AccessData. I have advanced knowledge of and certifications for both Verdict Systems and inData. I now manage the legal technology company, Trial Tech LLC.

In my legal experience I have worked extensively for both defense and plaintiff counsel in both civil and criminal matters.

EDUCATION:

UTAH STATE UNIVERSITY, Logan Utah 1998-2001
BFA GRAPHIC DESIGN/COMMERCIAL ART with emphasis in PHOTOGRAPHY

WEBER STATE UNIVERSITY, Ogden Utah 1995; 1997-1998 Art/Art History Major

PROFESSIONAL EXPERIENCE:

TRIAL TECH LLC, Salt Lake City Utah – 2006-2018 Senior Trial Consultant

Trial Tech provides IT services for the legal community including; Graphics (3D and 2D), Videography and Video Editing, Trial Consulting, Evidence Presentations and Computer Forensics.

SYSTEMS WEST LITIGATION SERVICES, Sandy Utah – 2002-2006 IT Manager

Systems West Litigation Resources provides Document Management, Demonstrative Graphics, Trial Evidence Presentations and Trial Consulting

VIEWPOINT DIGITAL, Salt Lake City Utah – 2001-2002 Senior Designer

ViewPoint Digital provided "Rich Media" or 3D content for the entertainment industry and online retailers.

SUN DESIGN GROUP, Logan Utah - 1998-2001

SDG is a local advertising firm in the Cache Valley region the specialized in Print Media, Corporate ID and Web Design

TRIAL EXPERIENCE: I have presented evidence in over 100 trials including but not limited to:
Safeway v Consonus
Proctor and Gamble v Amway
SCO v Novell
Lutron v Control 4
US v US Magnesium
Bueno Conato V Bajio
Frazier v ASC
Gleason v Tran
US v Geddes
US v Koerber
Gonzales v Novosel
Adel v Westgate
US v Johnson
Mason v BYU
Arnold v Curtis
US v Flood
Benjamin v Datamark
Lefavi v Utah Water Company
Hillcrest v UDOT
Bracken v Wasatch Electric
Macey v Dole
Thompson v Becker
Walker v Orem
US v Merrill